David Ward **KLUGER HEALEY, LLC** 219 Broad Street Red Bank, NJ 07701 P: (732) 852-7500 F: (888) 635-1653

Brian G. Bodine (Pro Hac Vice) Gretchen J. Hoog (Pro Hac Vice) **LANE POWELL, PC** 1420 Fifth Avenue, Suite 4200 Seattle, WA 98101 Telephone: (206) 223-7000

Attorneys for Defendant

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

STRIKEFORCE TECHNOLOGIES, INC.,

Plaintiff,

VS.

AUTHENTIFY PATENT CO., LLC,

Defendant.

Civil Action No. 13-03242 (JEI) (AMD)

NOTICE OF MOTION TO DISMISS PURSUANT TO FED.R.CIV.P. 12(b)(2) OR, ALTERNATIVELY, TO TRANSFER

MOTION RETURNABLE August 5, 2013

PLEASE TAKE NOTICE, that on August 5, 2013, defendant Authentify Patent Co., LLC shall move before the Hon. Joseph E. Irenas, United States District Judge, United States District Court, District of New Jersey, Camden Vicinage, for an Order dismissing the Complaint against on the grounds of lack of personal jurisdiction pursuant to Fed.R.Civ.P 12(b)(2) or alternatively, for an Order transferring this matter because of improper venue.

In support of this motion, defendant shall rely upon the Declaration of John Bettinger and the Brief submitted herewith.

A proposed form of Order is also submitted herewith.

DATED: July 12, 2013

KLUGER HEALEY, LLC

/s/David A. Ward By: David Ward

Brian G. Bodine, Esq. (*Pro Hac Vice*) Gretchen J. Hoog, Esq. (*Pro Hac Vice*) LANE POWELL, PC Attorneys for Authentify Patent Co., LLC